

PSJ3  
Exhibit 692

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION  
4

5 -----x MDL No. 2804  
6 IN RE: NATIONAL PRESCRIPTION ) Case No.  
7 OPIATE LITIGATION ) 1:17-MD-2804  
8 APPLIES TO ALL CASES ) Hon. Dan A. Polster  
9 -----x

10 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
11 CONFIDENTIALITY REVIEW  
12

VIDEOTAPED DEPOSITION OF ELIZABETH T. TATUM

13  
14 WASHINGTON, D.C.

TUESDAY, DECEMBER 11, 2018

15  
16 9:27 A.M.  
17  
18  
19  
20  
21  
22  
23

24 Reported by: Leslie A. Todd

1 Lippe.

2 Q How do you spell Lippe?

3 A Lippe, L-I-P-P-E.

4 Perry Fine. Lynn Webster. Scott

5 Fishman. Jerome Schofferman.

6 Q Did you say Jerome?

7 A Jerome.

8 Q And the last name was?

9 A Schofferman.

10 That's -- that's all I remember.

11 Q Do you recall whether David Haddox was

12 on the board of the AAPM during the time frame

13 that you were employed at AAPM?

14 A Yes, he was on the board.

15 Q Do you recall the names of any other

16 persons who were on the board of directors at AAPM

17 during the time frame that you were at AAPM?

18 A No.

19 Q Can you tell me how a member of the AAPM

20 got a position on the board of directors?

21 MS. VICARI: Objection to form.

22 THE WITNESS: There was a nominating

23 committee, and then there was a vote by the

24 members.

1 companies that are listed here, does this mean  
2 that they provided funding to AAPM?

3 A Yes.

4 Q And does --

5 A To support this specific program.

6 Q And does the -- at the top where it says  
7 "Four Star Diamond," does that mean that they  
8 would have paid more money than the next line, the  
9 diamond?

10 A Yes.

11 Q And do you recall what the distinction  
12 was between the different levels that are set out  
13 here?

14 A No, I don't remember the dollar amount.

15 Q If an entity provided funding for this  
16 conference, do you know if there was a level --  
17 another level that they wouldn't have appeared on  
18 the brochure?

19 A I don't remember.

20 MS. BAISCH: All right. I'm going to  
21 take a break.

22 THE VIDEOGRAPHER: The time is 12:23  
23 p.m. We're going off the record.

24 (Recess.)